

FILED  
U.S. BANKRUPTCY COURT

Allyson Staahl Drew, 733 Via Palo Alto Aptos, CA 95003

Case No.: 23-10063 (SHL)

S.D. OF N.Y.

To whom it may concern:

I DO oppose the disallowance and expungement of my claim. This is my written response to the Objection.

(i) below is: a caption identifying the name of the Bankruptcy Court, the names of the Debtors, the case number and the title of the Objection to which the Response is directed;

- UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK
- The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.
- Case No.: 23-10063 (SHL)
- My response is directed at this Objection: "THE OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. "

(ii) below is: the name of the claimant and description of the basis for the claim;

- Claimant is Allyson Staahl Drew
- Basis for claim: "I have attached my assets that are frozen in my Genesis Global Holdco account. They have been frozen since Genesis filled for bankruptcy.

(iii) a short statement describing the reasons for which the claim should not be disallowed and expunged as set forth in the Objection;

- I have \$1070.09 in my Gemini account. Gemini filed the Master Claim bankruptcy and state that this is my pending balance displaying the Earn-related digital assets that were included in the Master Claim on my

behalf by Genesis.

- I have \$1070.09 GUSD in digital assets that Gemini owes me. I have attached a copy of my digital wallet with Gemini showing this exact amount.

(iv) additional documentation or other evidence upon which you rely in opposing the Objection (if it was not included with the proof of claim previously filed with the Bankruptcy Court);

- See photos attached.

(v) the address(es) to which the Debtors must return any reply to your Response, if different from that presented in your proof of claim;

- It is the same as the proof of claim: Allyson Staahl Drew, 733 Via Palo Alto, Aptos, CA 95003

(vi) the name, address, and telephone number of the person (which may be you or your legal representative) holding ultimate authority to resolve the claim on your behalf.

- Allyson Staahl Drew
- 733 Via Palo Alto, Aptos, CA 95003
- (831) 588-5666

- allysondds@gmail.com

Signature Allyson Drew, DDS

Date 12/13/2023

1,070.09 GUSD

**i** Gemini has now filed the Master Claim in the Genesis bankruptcy proceeding, as explained in our emails on April 11, 2023, and May 12, 2023. Your "pending balances" now display the Earn-related digital assets included in the Master Claim on your behalf. The current market value of the digital assets owed to you is no longer shown.

[Learn more](#)

### Description

Initiated on	Jan 10, 2023 7:47:00 AM
Status	Pending
From	Earn balance
To	Trading balance
Funds due by	Jan 17, 2023
Funds available by	<a href="#">Learn more</a>
Available now	0 GUSD

Genesis bankruptcy proceeding, as explained in our emails on April 11, 2023, and May 12, 2023. Your "pending balances" now display the Earn-related digital assets included in the Master Claim on your behalf. The current market value of the digital assets owed to you is no longer shown.

[Learn more](#)

### Description

Initiated on	Jan 10, 2023 7:47:00 AM
Status	Pending
From	Earn balance
To	Trading balance
Funds due by	Jan 17, 2023
Funds available by	<a href="#">Learn more</a>
Available now	0 GUSD
Pending redemption	1,070.09 GUSD
Total	1,070.09 GUSD

3/5



Hearing Date and Time: January 3, 2024 at 10 A.M. (ET)  
Objection Deadline: December 21, 2023 at 4:00 P.M. (ET)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF HEARING ON DEBTORS' FIFTH OMNIBUS  
OBJECTION (NON-SUBSTANTIVE) TO PROOFS OF CLAIM (NO LIABILITY)**

**TO THE CLAIMANTS WHOSE CLAIMS ARE OBJECTED TO BY THIS  
OBJECTION (DEFINED BELOW):**

- **THE OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.**
- **YOU SHOULD LOCATE YOUR CLAIM(S) ON EXHIBIT 1 ANNEXED TO THE OBJECTION AND ATTACHED HERETO.**
- **YOUR RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTION(S) THAT MAY BE FILED BY THE DEBTORS. YOUR CLAIM(S) MAY BE DISALLOWED, EXPUNGED, RECLASSIFIED, REDUCED, OR OTHERWISE AFFECTED AS A RESULT OF THIS OBJECTION. THEREFORE, PLEASE READ THIS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**
- **THE RELIEF SOUGHT IN THE OBJECTION IS WITHOUT PREJUDICE TO THE DEBTORS' RIGHTS, CONSISTENT WITH PRIOR COURT ORDERS, TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION.**

PLEASE TAKE NOTICE that, on November 29, 2023, Genesis Global Holdco, LLC ("Holdco") and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), filed

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

the Debtors' Fifth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (No Liability) (the "Objection") with the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

**THIS OBJECTION ADDRESSES ONE OR MORE OF THE CLAIM(S) YOU HAVE FILED IN THE DEBTORS' CASES.** Exhibit 1 annexed to the Objection (and attached hereto) identifies your claim and the category of claim objection applicable to you.

The Objection requests that the Bankruptcy Court **disallow and expunge** one or more of your claims listed in Exhibit 1 under "**Claim(s) to Be Disallowed & Expunged,**" on the ground that **the claims are inconsistent with or contradict the Debtors' books and records.** Any claim that the Bankruptcy Court expunges or disallows will be treated as if such claim had not been filed.

Certain of the Debtors' advisors will be available to discuss and resolve consensually the Objection to your claim(s) without the need for filing a formal response or attending a hearing. Please contact Cleary Gottlieb Steen & Hamilton LLP, the Debtors' restructuring counsel, via e-mail at dfike@cgsh.com and kross@cgsh.com within twenty (20) calendar days after the date of this notice or such other date as the Debtors may agree in writing.

If you DO NOT oppose the disallowance and expungement of your claim(s) then no further action is required by you. If you DO oppose the disallowance and expungement of your claim(s) then you MUST file and serve a written response to the Objection (the "Response") **ON OR BEFORE DECEMBER 21, 2023 AT 4:00 P.M. EASTERN TIME** (the "Response Deadline").

The Response, if any, must include the following: (i) a caption identifying the name of the Bankruptcy Court, the names of the Debtors, the case number and the title of the Objection to which the Response is directed; (ii) the name of the claimant and description of the basis for the claim; (iii) a short statement describing the reasons for which the claim should not be disallowed and expunged as set forth in the Objection; (iv) additional documentation or other evidence upon which you rely in opposing the Objection (if it was not included with the proof of claim previously filed with the Bankruptcy Court); (v) the address(es) to which the Debtors must return any reply to your Response, if different from that presented in your proof of claim; (vi) the name, address, and telephone number of the person (which may be you or your legal representative) holding ultimate authority to resolve the claim on your behalf.

The Bankruptcy Court will consider a Response only if the Response is filed, served, and received in a timely manner. A Response is filed, served and received in a timely manner only if the original Response is actually received on or before the Response Deadline by (i) the Bankruptcy Court at Chambers of Judge Sean H. Lane, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10610, (ii) counsel for the Debtors at Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, Attn: Sean A. O'Neal (soneal@cgsh.com), Luke A. Barefoot (lbarefoot@cgsh.com) and Jane VanLare (jvanlare@cgsh.com)), and (iii) the Debtors at 250 Park Avenue South, 5<sup>th</sup> Floor, New York, NY 10003; and (iv) counsel to the Official Committee of Unsecured Creditors, 1221 Avenue of the Americas, New York, NY 10020, Attn: Philip Abelson (philip.abelson@whitecase.com).



**A HEARING WILL BE HELD ON JANUARY 3, 2024** (the “Hearing”) to consider the Objection. **THE HEARING WILL BE HELD AT 10:00 A.M. (EASTERN TIME)** at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10610 in front of the Honorable Sean H. Lane. The Debtors may adjourn this hearing. If the hearing is adjourned, you will receive notice of the adjournment and an update on the time and place of the re-scheduled hearing.

A Response that is not filed and served on or before the Response Deadline or such other date as agreed with the Debtors, in accordance with the procedures set forth herein, may not be considered at the Hearing before the Court. Absent reaching an agreement with the Debtors that resolves the Omnibus Objection to your claim, failure to file and serve a Response timely as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing and the disallowance and expungement of your claim.

If you file a written Response to the Objection, you must attend the Hearing. In light of the COVID-19 pandemic, the Hearing may be conducted telephonically. Under such circumstances parties wishing to participate in the Zoom hearing should use the eCourt Appearances link on the Court’s website: <https://www.nysb.uscourts.gov/ecourt-appearances>. After the deadline to make appearances passes, the Court will circulate by email prior to the Hearing the Zoom links to those persons who made eCourt Appearances, using the email addresses submitted with those appearances. Members of the public who wish to listen to, but not participate in, the Hearing free of charge may do so by calling the following muted, listen-only number: 1-929-205- 6099, Access Code: 92353761344#. The Debtors, reserve the right to continue the Hearing on the Objection for your claim(s) at a later date. If the Bankruptcy Court does NOT disallow or expunge your claim(s) then the Debtors may object on other grounds to the claim(s) (or to any other claims you may have filed) at a later date. You will receive a separate notice of any such objection.

Dated: November 29, 2023  
New York, New York

/s/ Luke A. Barefoot  
Sean A. O’Neal  
Luke A. Barefoot  
Jane VanLare  
CLEARY GOTTLIEB STEEN &  
HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
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*Counsel to the Debtors  
and Debtors-in-Possession*